

FTB:EWS/IC
F. #2023R00597/OCDETF#NY-NYE-0928

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

WENDY DEJESUS,

Defendant.

----- X

THE GRAND JURY CHARGES:

FIREARMS TRAFFICKING

1. In or about and between October 2022 and November 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant WENDY DEJESUS, together with others, not being a licensed importer, licensed manufacturer or licensed dealer in firearms, did knowingly and willfully engage in the business of dealing in firearms, and in the course of such business did ship, transport and receive one or more firearms in interstate and foreign commerce, to wit: (1) a 9mm caliber Canik TP9 Elite SC pistol with serial number 20CB32964, and (2) a .25 caliber Astra CUB pistol with serial number 958900.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), 2 and 3551 et seq.)

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* AUGUST 28, 2023 *
BROOKLYN OFFICE

I N D I C T M E N T

Cr. No. 23-CR-349
(T. 18, U.S.C., §§ 922(a)(1)(A),
924(a)(1)(D), 924(d)(1), 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

Judge Rachel P. Kovner
Magistrate Judge James R. Cho

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922, including but not limited to:

- (a) one 9mm caliber Canik TP9 Elite SC pistol with serial number 20CB32964, seized in Ridgewood, New York on or about October 25, 2022; and
- (b) one .25 caliber Astra CUB pistol with serial number 958900, seized in Brooklyn, New York on or about November 28, 2022.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2023R00597
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

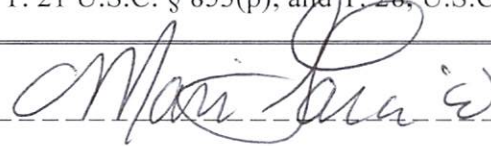
WENDY DEJESUS,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 922(a)(1)(A), 924(a)(1)(D), 924(d)(1), 2 and 3551 et
seq.; T. 21 U.S.C. § 853(p); and T. 28, U.S.C., § 2461(c))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Eric Silverberg and Irisa Chen, Assistant U.S. Attorneys, (718) 254-7000